

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

vs.

**CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS et al.,**

Defendants.

Civil Action No. 2:25-cv-00391

(Lead Case)

JURY TRIAL DEMANDED

**HEADWATER’S UNOPPOSED MOTION TO EXTEND PROPOSED DOCKET
CONTROL ORDER, DISCOVERY ORDER, AND PROTECTIVE ORDER DEADLINES**

Plaintiff Headwater Research LLC (“Headwater”) respectfully files this Unopposed Motion to Extend Deadlines for Proposed Docket Control Order, Proposed Discovery Order, and Proposed Protective Order, and would show the Court as follows:

The current deadline for the parties to file the proposed docket control order and proposed discovery order is July 30, 2025. The current deadline for the parties to file the proposed protective order is August 6, 2025. The parties agree to a brief mutual extension of these deadlines, which will allow additional time for the parties to prepare their proposed orders. No other deadlines will be affected by these amendments.

Headwater represents that this Motion is not filed for the purposes of delay but rather so that justice may be served. The parties have met and conferred, and Defendants do not oppose this Motion. Accordingly, Headwater respectfully requests that the Court enter an Order modifying the above deadlines as follows:

Original Date	Amended Date	Event
July 30, 2025	August 6, 2025	File Proposed Docket Control Order and Proposed Discovery Order
August 6, 2025	August 13, 2025	File Proposed Protective Order

Dated: July 30, 2025

Respectfully submitted,

/s/ Marc Fenster

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*Attorneys for Plaintiff,
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on July 30, 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster
Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). Defendants do not oppose this motion.

/s/ Marc Fenster
Marc Fenster